

OCT 02 1990

Honorable John Paul Hammerschmidt  
House of Representatives  
Washington, DC 20515

Dear Mr. Hammerschmidt:

In further response to your concern regarding the proposed remedy for the Arkwood, Inc. Superfund site, I am pleased to provide additional information.

EPA has selected a final remedy that includes sieving and washing the contaminated soils and then incinerating, onsite, those soils that still do not meet the cleanup goals.

The U.S. Environmental Protection Agency (EPA) is sensitive to your constituent's concerns, and fully intends to work with the community of Omaha to address and allay concerns they have regarding the selected remedy. EPA selected an incineration remedy because it is necessary in order to provide long-term protection of your constituents' health and environment. EPA believes that adding the sieve and wash prior to incineration will substantially reduce the amount of material requiring incineration, thereby reducing the time required for the incineration. It has been estimated that the amount previously proposed for incineration, just over 20,000 cubic yards, will be reduced to approximately 7,000 cubic yards. EPA is hopeful that this reduction will increase your constituents' acceptance of the remedy.

During an open house at the Omaha Public School, EPA did state that there was little possibility of performing onsite incineration at the Arkwood site, but EPA also said in the same sentence that it was too early to speculate on an appropriate remedy. EPA went on to say that the preferred remedy could not be developed until all reports were final. The purpose of the February Open House was to discuss the findings of the Remedial Investigation, rather than to discuss the results of the Feasibility Study, which had yet to be completed. At that time, preliminary review of treatability test results indicated that the sieve and wash and biological treatment technologies might meet EPA remedial requirements. However, further review of the alternative technologies indicated that these treatment technologies, alone, would not be sufficient to reduce site contaminants to acceptable levels. Since the incineration alternative was the only

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alternative identified in the Feasibility Study, capable of reducing the site's contamination to acceptable levels, it was proposed as the appropriate remedy. Upon review of all the comments received during the public comment period, EPA selected the remedy as sieve and wash prior to incineration.

You are correct in saying that sinkholes are a concern at the site. However, the concern over sinkholes is not the predominant reason EPA rejected capping high concentrations of hazardous substances. A capping remedy was rejected because of the Comprehensive Environmental Response, Compensation, and Liability Act's (CERCLA) preference for permanent treatment of hazardous substances. The possibility of sinkholes was considered, however, and this possibility does underscore the need for permanent treatment. In addition, off-site remedies were rejected because off-site transport, and disposal without treatment, is the least preferred remedy, according to CERCLA.

Incineration is a proven technology that has been used at numerous other locations. It is safe, even with the public school in such close proximity. EPA believes that a well designed and properly operated incinerator will not cause health or environmental problems. Based on the best available information concerning the risks of incineration, EPA has developed strict standards that limit the emissions from hazardous waste incinerators. The incinerator will be required to demonstrate that it can meet these standards during a test burn and must meet these standards at all times during the actual incineration. Air monitors will be placed around the site and at the school to ensure that air quality is safely maintained.

I hope this information is helpful in responding to your constituents' concerns. Please allow me to assure you that protection of the Omaha area's public health and environment is our highest priority. If I can be of further assistance, please do not hesitate to contact me.

Sincerely yours,

/s/ Robert E. Layton Jr

Robert E. Layton Jr., P.E.  
Regional Administrator